

September 11, 2008

Ms. Jennifer Sutter Oregon Department of Environmental Quality 2020 SW Fourth Avenue Portland, OR 97201

Subject:

Swan Island Upland Facility

Quarterly Progress Report – June 16, 2008 through September 15, 2008

ECSI No. 271

Dear Ms. Sutter:

The purpose of this letter is to provide the Oregon Department of Environmental Quality (DEQ) with a quarterly progress report on behalf of the Port of Portland (Port) for the Swan Island Upland Facility (Facility). This letter satisfies the requirements of the Voluntary Cleanup Program (VCP) Agreement for Remedial Investigation and Source Control Measures, effective July 24, 2006, which includes the following for the reporting period June 16 through September 15, 2008:

- Actions performed under the VCP Agreement
- Other actions completed in the reporting period
- Data generated
- Problems experienced and resolution
- Actions scheduled for the next reporting period (September 16 through November 15, 2008)

Actions Performed Under the VCP Agreement:

- On June 30, 2008 submitted a response to DEQ's November 30, 2007 request for additional information in support of the OU3 no further action determination.
- On July 21, 2008 received a letter from DEQ in response to the Port's June 30, 2008 comment response.
- On July 11, 2008 submitted a No Further Action determination request for OU4.
- On August 12, 2008 submitted a comment letter responding to the DEQ's March 18,
 April 10 and April 29, 2008 comments related to the OU2 outfalls evaluation.
- On August 5, 2008 submitted an email presenting the Human Health Risk Assessment outlines for OU1 and OU2.
- On September 4, 2008, received an email from the DEQ requesting a more detailed Human Health Risk Assessment outlines.
- On June 4, 2008 submitted the Level I Ecological Risk Assessment for OU1.
- On July 1, 2008 received a comment letter from DEQ regarding the Level I Ecological Risk Assessment for OU1
- On August 28, 2008 submitted the Revised Level I Ecological Risk Assessment for OU1.

Other Actions Completed in the Reporting Period:

Storm water system cleanouts were completed on OU2 and OU3 as part of the regular maintenance activities.

Data Generated:

None

Problems Experienced and Resolution:

None

Actions Scheduled for the Next Reporting Period (September 16 through November 15, 2008):

- Prepare a Source Control Evaluation for OU2 following sampling proposed in the Port's August 12, 2008 letter to the DEQ.
- Prepare an OU3 Storm Water Evaluation Work Plan.
- Submit more detailed Human Health Risk Assessment outlines.
- Submit OU1 Human Health Risk Assessment.
- Submit OU2 Human Health Risk Assessment.
- Port will assist DEQ with response to EPA comments on Source Control Decision for OU3.

Please call if you have any questions regarding this progress report.

Sincerely.

Kelly Madalinski

Environmental Project Manager

Kristine Koch, EPA CC: Erik Muller, Pacific Rock Products David Ashton, Port Suzanne Barthelmess, Port Richard Vincent, Port Stu Brown, Bridgewater Group Amanda Spencer, Ash Creek Associates Mark Lewis, NewFields

LWP File